# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

EIGHT MILE STYLE, LLC and MARTIN AFFILIATED, LLC

Plaintiffs,

Case No. 3:19-cv-00736

v.

District Judge Aleta A. Trauger

SPOTIFY USA INC.,

Defendant.

#### JOINT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

Plaintiffs Eight Mile Style, LLC and Martin Affiliated, LLC (collectively, "Plaintiffs") and Defendant Spotify USA Inc. ("Defendant") hereby provide notice that they agree and stipulate that Defendant's period to respond to the complaint shall be extended by sixty (60) days to October 28, 2019. This is Defendant's first request for extension of time to respond. Defendant specifically reserves all rights to request a change of venue under 28 U.S.C. § 1404 and/or assert any and all defenses including, but not limited to, lack of personal jurisdiction, improper venue, lack of standing, and other applicable defenses. Plaintiffs reserve the rights to object to any defense asserted by Defendant and oppose any such motion filed by Defendant.

Wherefore, the parties respectfully request the Court extend Defendant's period to respond to the complaint by sixty (60) days to October 28, 2019.

## Respectfully submitted,

### KING & BALLOW

## /s/ Richard S. Busch (w/ permission)

Richard S. Busch (TN BPR No. 14594) 315 Union Street, Suite 1100 Nashville, Tennessee 37201 Telephone: (615) 726-5422

Facsimile: (615) 726-5417 Email: rbusch@kingballow.com

Counsel for Plaintiffs

### MILLER LEGAL PARTNERS PLLC

## /s/ Samuel F. Miller

Samuel F. Miller (BPR No. 022936) Fifth Third Center – Suite 2000 424 Church Street Nashville, TN 37219

Telephone/Fax: (615) 988.9011

Email: smiller@millerlegalpartners.com

Counsel for Defendant

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 6, 2019, a copy of the foregoing *JOINT MOTION* FOR EXTENSION OF TIME TO FILE RESPONSE was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

Richard S. Busch King & Ballow 315 Union Street, Suite 1100 Nashville. Tennessee 37201 rbusch@kingballow.com

James Franklin Blumstein Of Counsel Vanderbilt University 131 21st Avenue South Nashville, TN 37203 james.blumstein@vanderbilt.edu

/s/ Samuel F. Miller